

**KATSKY KORINS LLP**  
**605 Third Avenue**  
**New York, New York 10158**  
**(212) 953-6000**

**KASOWITZ BENSON TORRES LLP**  
**1633 Broadway**  
**New York, New York 10019**  
**(212) 506-1700**

October 8, 2018

**VIA ECF AND EMAIL**

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Ambase Corporation, et al. v. 111 West 57th Sponsor, LLC, et al.*  
Case No. 18-CV-05482 (AT)(GWG)(S.D.N.Y.)

Dear Judge Torres:

We write regarding Plaintiffs' October 3, 2018 letter, which we believe was filed in violation of the Court's Individual Practices Rules that require a single four-page pre-motion letter submitted within five days of the movants' pre-motion letter. Our pre-motion letter for the motion to stay was submitted on August 28, 2018 and Plaintiffs' original response was submitted on August 30, 2018. The Court has already ruled that you will set a briefing schedule for the motion to stay at the initial pretrial conference.

We will not compound Plaintiffs' violation of your rules by responding in kind. If Your Honor would like us to send a substantive response to Plaintiffs' October 3 letter, we will, of course, do so upon receiving such instructions from you. Otherwise, we will be prepared to address the issues relating to the motion to stay (as well as the erroneous accusations made in Plaintiffs' October 3 letter) at the initial pretrial conference.

Respectfully submitted,

Hon. Analisa Torres  
October [X], 2018  
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KATSKY KORINS LLP

KASOWITZ BENSON TORRES LLP

By: /s/ Joel S. Weiss  
Joel S. Weiss  
(jweiss@katskykorins.com)  
Robert A. Abrams  
(rabrams@katskykorins.com)  
Haley E. Adams  
(hadams@katskykorins.com)

By: /s/ Paul M. O'Connor III  
Paul M. O'Connor III  
(poconnor@kasowitz.com)  
Jed I. Bergman  
(jbergman@kasowitz.com)  
Jennifer McDougall  
(jmcDougall@kasowitz.com)

605 Third Avenue  
New York, New York 10158  
Tel: (212) 953-6000

1633 Broadway  
New York, New York 10019  
Tel: (212) 506-1700

*Counsel for Defendants PMG West 57th Street LLC, 111 West 57th KM Equity LLC, 111 West 57<sup>th</sup> KM Group LLC, Kevin Maloney, Ned White, and Property Markets Group, Inc.*

*Counsel for Defendants 111 West 57th JDS LLC, Michael Stern, Matthew Phillips, JDS Development LLC, and JDS Construction Group LLC*

*Co-Counsel for Defendants 111 West 57th Sponsor LLC, 111 West 57th Control LLC, 111 West 57th Developer LLC, 111 Construction Manager LLC, and 111 West 57th Partners LLC*

*Co-Counsel for Defendants 111 West 57th Sponsor LLC, 111 West 57th Control LLC, 111 West 57th Developer LLC, 111 Construction Manager LLC, and 111 West 57th Partners LLC*

cc: Counsel of Record (via ECF and email)